

Monte J. White & Associates, P.C.
Monte J. White
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE: §
Thomas Lee Barrells § Case No.09-70073-HdH-13
Debtor §

MOTION TO SELL SECURED PROPERTY FREE AND CLEAR OF LIENS

Comes now Debtor, Thomas Lee Barrells, and respectfully shows the Court the following:

1. Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code on February 26, 2009.
2. Debtor received a loan from Wells Fargo Home Mortgage for the purchase of 808 Mohawk, Burkburnett, Wichita County, TX further described as Lot 5, Block 7, Janlee Heights 6.
3. Debtor has scheduled Wells Fargo Home Mortgage as a secured creditor on Schedule D of the petition and has treated Wells Fargo Home Mortgage as a secured creditor in the Chapter 13 Plan;
4. Debtor wishes to sell the house and apply the proceeds of such sale to the principle debt owing Wells Fargo Home Mortgage in the approximate amount of \$127,000.00 , and;
5. Debtor has located a buyer and an agreement has been reached to sell the house for \$139,000.00. Said agreement is attached as EXHIBIT A.
6. Debtor requests that the Court grant permission to pay such expenses of sale as set forth in the said attached agreement (EXHIBIT A).
7. Debtor requests permission to pay, at the time of closing, the amount of \$400.00 for the preparation and filing of this motion.

FOR THESE REASONS, Debtor requests an order allowing the sale of real property located at 808 Mohawk, Burkburnett, Wichita County, TX, that Wells Fargo Home Mortgage 's lien attach to the proceeds of the sale pending distribution, that costs of sale be paid as per the contract at closing, that taxes be prorated to and paid at the time of closing, that the Trustee be provided a copy of the closing statement that attorney fees in the amount of \$400.00 are approved and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

/s/Monte J. White
Monte J. White & Associates, P.C.
1106 Brook Ave, Hamilton Place
Wichita Falls, TX 76301
(940)723-0099
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 10, 2009, a true and correct copy of the foregoing was served on all parties on the mailing matrix by ECF and/or regular mail:

/s/Monte J. White

Case 09-70073-hdh13 Doc 32 Filed 12/10/09 Entered 12/10/09 15:06:46 Desc Main Document Page 3 of 4
Label Matrix for local noticing 1100 Commerce Street Room 1254 BURKBURNETT INDEPENDENT SCHOOL DISTRICT
0539-7 Dallas, TX 75242-1305 CO PERDUE BRANDON FIELDER COLLINS & MOT
Case 09-70073-hdh13 PO BOX 8188
Northern District of Texas WICHITA FALLS TX 76307-8188
Wichita Falls
Wed Dec 9 11:35:43 CST 2009

Chase Bank USA NA City of Burk-ISD-Wichita County ECast Settlement Corporation
PO BOX 15145 CO Harold Lerew Bass & Associates, P.C.
Wilmington DE 19850-5145 PO Box 8188 3936 E. Ft. Lowell Rd., Suite No. 200
Wichita Falls, TX 76307-8188 Tucson, AZ 85712-1097

Elan Financial Service-TCCU (p)US BANK HSBC Bank Nevada, N.A.
777 E Wisconsin Ave PO BOX 5229 eCAST Settlement Corporation
Milwaukee, WI 53202-5300 CINCINNATI OH 45201-5229 CO Bass & Associates, P.C.
3936 E. Ft. Lowell Rd., Suite 200
Tucson, AZ 85712-1083

HSBC Best Buy Hardeman County Memorial Hospital IRS Special Procedures
Attn: Bankruptcy P.O.Box 90 1100 Commerce St., Room 951
PO Box 6985 Quanah, Tx 79252-0090 Mail Stop 5029 DAL
Bridge Water, NJ 08807-0985 Dallas, TX 75242-1001

Monte J. White & Associates PRA Receivables Management LLC Portfolio Recovery Associates, LLC.
1106 Brook Ave PO Box 41067 PO Box 41067
Wichita Falls TX 76301-5009 Norfolk, VA 23541-1067 Norfolk VA 23541-1067

Teresa Barrells Texoma Community Cr Un WICHITA COUNTY & CITY OF BURKBURNETT
5429 Carlson Po Box 1320 CO PERDUE BRANDON FIELDER COLLINS & MOT
Wichita Falls, TX 76302-5140 Wichita Falls, TX 76307-1320 PO BOX 8188
WICHITA FALLS TX 76307-8188

Washington Mutual - Providian Wells Fargo Bank N.A. Wells Fargo Bank, N.A.
Attn: Bankruptcy Dept. P.O. Box 829009 PO BOX 829009
PO Box 10467 Dallas, Texas 75382-9009 Dallas, TX 75382-9009
Greenville, SC 29603-0467

Wells Fargo Hm Mortgag eCast Settlement Corporation Monte J. White
Attention: Bankruptcy Department MAC-X CO Bass & Associates, P.C. Monte J. White & Associates, P.C.
3476 Stateview Blvd 3936 E. Ft. Lowell Rd., Suite No. 200 1106 Brook Avenue
Fort Mill, SC 29715-7203 Tucson, AZ 85712-1097 Wichita Falls, TX 76301-5009

Thomas Lee Barrells UST U.S. Trustee Walter 12,13 OCheskey
PO Box 735 1100 Commerce Street 6308 Iola Avenue
Holliday, TX 76366-0735 Room 976 Lubbock, TX 79424-2735
Dallas, TX 75242-1011

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(u)Wells Fargo Bank, N.A.

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	1
Total	27